

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

ORIGINAL

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Amendment of Section 73.202(b))

Table of Allotments,)

FM Broadcast Stations)

(Auburn, Alabama))

MM Docket No. 01-104

RM-10103

To: Chief, Allocations Branch
Stop Code 1800D5

REPLY COMMENTS
OF COX RADIO, INC. AND CXR HOLDINGS, INC.

1. Cox Radio, Inc. and its wholly-owned subsidiary CXR Holdings, Inc. (collectively "Cox"), by their attorneys, respectfully submit these reply comments pursuant to the Commission's *Notice of Proposed Rulemaking* in the above-captioned proceeding ("Notice").¹ The *Notice* proposed the allotment of Channel 263A to Auburn, Alabama ("Auburn Proposal"), as the community's second local FM service pursuant to a Petition for Rule Making ("Petition") submitted by Auburn Network, Inc. ("Auburn Network").

2. By these reply comments,² Cox respectfully urges the Commission to dismiss the Auburn Proposal given Auburn Network's withdrawal of interest and given that no other party has expressed an interest in the proposed allotment. In addition, Cox opposes the counterproposal of International Systems Corp. ("ISC") proposing the allotment of Channel

¹ In the Matter of Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Auburn, Alabama), *Notice of Proposed Rule Making*, DA 01-1093, MM Docket No. 01-104, RM-10103 (rel. April 27, 2001) ("Notice").

² Cox reserves the right to file additional comments if the Commission issues a Public Notice for the counterproposals filed in this proceeding.

No. of Copies rec'd 014
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262A to Camp Hill, Alabama, as a first local service (“Camp Hill Counterproposal”).³ The Commission should dismiss the Camp Hill Counterproposal because the proposed allotment at the specified reference coordinates would not provide city grade coverage over the entire community of license as required by Section 73.315(a) of the Commission’s Rules. Moreover, ISC fails to establish that Camp Hill qualifies as a community meriting a first local service preference. Accordingly, the Commission should deny the Camp Hill Counterproposal and grant Cox’s competing counterproposal.

BACKGROUND

3. In response to the *Notice*, on June 18, 2001, Cox submitted its Comments and Counterproposal proposing a mutually exclusive set of interrelated allotments as a counterproposal to the Auburn Proposal (“Cox’s Counterproposal”).⁴ Cox’s Counterproposal complies with the Commission’s technical requirements and would provide first local service to the communities of Gardendale, Goodwater and Jemison, Alabama, while maintaining local service in Homewood, Alabama. Moreover, Cox’s Counterproposal would provide Homewood with a Class C rather than a Class A station and create a “net” gain in service to 221,595 persons over an area of 6,030 square kilometers. Cox’s Comments and Counterproposal set forth in detail Cox’s proposed amendments to the FM Table of Allotments, provided copies of consents from the licensees of all affected stations and pledged to reimburse the licensees for reasonable costs in implementing the requested modifications.⁵

³ Counterproposal of International Systems Corp., filed in MM Docket No. 01-104, RM-10103 on June 18, 2001 (“ISC’s Counterproposal”).

⁴ Comments and Counterproposal of Cox Radio, Inc. and CXR Holdings, Inc., filed in MM Docket No. 01-104, RM-10103 on June 18, 2001 (“Cox’s Comments and Counterproposal”).

⁵ *Id.* at pp. 2, 3, 18, 25, 26, 27-28, 32, 33, 37, 39 and at Exhibits A, E, F, G, I, K.

4. On June 1, 2001, Auburn Network filed comments stating its interest in the Auburn Proposal.⁶ Subsequently, however, Auburn Network agreed to withdraw its interest. On June 22, 2001, in accordance with the requirements of Section 1.420(j)(5) of the Commission's Rules, Cox filed the "Declaration of Richard A. Ferguson,"⁷ which described the circumstances of Auburn Network's withdrawal and stated that Cox had agreed to reimburse Auburn Network for the reasonable and prudent expenses that Auburn Network has incurred in pursuing the allotment.⁸ Cox understands that Auburn Network has withdrawn its interest. No other parties filed comments expressing an interest in the Auburn Proposal.

5. On June 18, 2001, ISC submitted its Camp Hill Counterproposal, which is mutually exclusive with Cox's proposal to substitute Channel 262A for Channel 247A at Dadeville for WZLM(FM).

I. THE COMMISSION SHOULD DISMISS THE AUBURN PROPOSAL DUE TO THE ABSENCE OF AN EXPRESSION OF INTEREST IN THE PROPOSED ALLOTMENT.

6. Auburn Network has withdrawn its interest in the Auburn Proposal pursuant to an oral agreement between Cox and Auburn Network through Cox's agent American Media Services, Inc.⁹ The terms of the agreement and the withdrawal are in compliance with the Commission's Rules stating that the filing party (Auburn Network) may not receive consideration in excess of legitimate and prudent expenses in exchange for its withdrawal.¹⁰

⁶ Comments of Auburn Network, Inc., filed in MM Docket No. 01-104, RM-10103, on June 1, 2001.

⁷ Declaration of Richard A. Ferguson filed in MM Docket No. 01-104, RM-10103, on June 22, 2001.

⁸ *Id.*

⁹ *Id.*

¹⁰ See 47 C.F.R. § 1.420(j)(1) (2000).

7. No other parties have expressed an interest in the Auburn Proposal. As the *Notice* states, “a showing of continuing interest is required...before a channel will be allotted.”¹¹ Thus, the Commission should dismiss the Auburn Proposal due to the absence of an expression of interest in the proposed allotment.¹²

8. Even though the Auburn Proposal will no longer be under consideration, the Commission may consider and grant counterproposals submitted in this proceeding.¹³ Accordingly, Cox respectfully urges the Commission to grant Cox’s Counterproposal in light of the extensive public interest benefits that would result.

II. THE COMMISSION MUST DENY THE CAMP HILL COUNTERPROPOSAL AS TECHNICALLY DEFICIENT AND CONTRARY TO THE PUBLIC INTEREST.

9. The Camp Hill Counterproposal filed by ISC proposes the allotment of Channel 262A to Camp Hill, Alabama, as a first local service. The Camp Hill Counterproposal should be dismissed because the proposed facilities would not encompass the community of license with a city grade signal as required by the Commission’s Rules. ISC also fails to establish that Camp Hill qualifies as a community meriting a first local service preference for the purposes of the Commission’s FM allotment priorities. Thus, even if the Commission were to consider the

¹¹ *Notice* at ¶ 3.

¹² *See, e.g., Shiner, Texas*, 15 FCC Rcd 10303, ¶ 2 (2000) (“It is the Commission’s policy to refrain from making an allotment to a community absent an expression of interest”); *Smiley, Texas*, 15 FCC Rcd 20292, ¶ 2 (2000) (same).

¹³ *See, e.g., Pitkin, Lake Charles, Moss Bluff, and Reeves, Louisiana*, 15 FCC Rcd 17311, ¶ 4 (stating that “it would not be conducive to the efficient transaction of Commission business to dismiss or otherwise defer action on valid counterproposals filed in response to the *Notice*” even where the Commission dismissed the allotment proposed in the *Notice of Proposed Rule Making* due to the absence of an expression of continuing interest); *Eastman, Vienna, Ellaville and Byromville, Georgia*, 15 FCC Rcd 17935 (2000) (granting counterproposals filed in an allotment proceeding where the Commission dismissed the allotment proposed in the *Notice of Proposed Rule Making* due to the absence of an expression of continuing interest).

Camp Hill Counterproposal, the Commission should deny the proposed allotment as contrary to the public interest.

A. The Camp Hill Counterproposal Violates The Commission's City Grade Coverage Requirement.

10. The Commission must reject the Camp Hill Counterproposal as technically deficient because the proposed allotment at the specified reference coordinates would violate the Commission's Rules requiring city grade coverage of the entire community of license.¹⁴ The 70 dBu contour of the proposed allotment for Camp Hill would encompass only 76% of the land area and 88% of the population of Camp Hill.¹⁵ Section 73.315(a) of the Commission's Rules requires a station to provide a minimum field strength of 70 dBu over the entire principal community to be served.¹⁶ Accordingly, the Camp Hill Counterproposal violates Section 73.315(a) of the Commission's Rules.

11. The failure of the Camp Hill Counterproposal to comply with the city grade coverage rule is fatal to the counterproposal.¹⁷ Counterproposals in FM allotment rule making proceedings must be "technically correct and substantially complete" at the time they are filed.¹⁸ In particular, the Commission "require[s] strict compliance with Section 73.315(a) at the

¹⁴ See 47 C.F.R. §73.315(a) (2000).

¹⁵ Exhibit A (Technical Exhibit of du Treil, Lundin & Rackley).

¹⁶ 47 C.F.R. §73.315(a) (2000).

¹⁷ See *Cloverdale, Montgomery and Warrior, Alabama*, 15 FCC Rcd 11050, ¶¶ 3, 6 (denying a counterproposal for failure to comply with Section 73.315(a) where the 70 dBu signal would encompass only 88% of the community of license); *Greenwood, Seneca, Aiken and Clemson, South Carolina*, 3 FCC Rcd 4108, ¶ 2 (1988) ("*Greenwood*") (denying a counterproposal for failure to comply with Section 73.315(a) where the 70 dBu signal would encompass only 87% of the community of license).

¹⁸ *Susquehanna and Hallstead, Pennsylvania*, 2000 FCC Lexis 6517, n.2 (rel. Dec. 8, 2000) ("*Susquehanna*").

allotment stage.”¹⁹ The Commission has explained the underlying policy reasons for requiring strict compliance with its technical requirements:

[I]t continues to be our view that in order to maintain the technical integrity of the FM broadcast service, we should strictly adhere to our technical requirements at the allotment stage in order to increase the likelihood that the eventual authorization will comply with our technical requirements. In this vein, if we did not require strict compliance with our technical requirements at the allotment stage, the likelihood of the subsequent application not complying with these requirements would be far greater. Therefore, at the allotment stage, we consider and require a theoretical reference site at which we may determine that a transmitter could be located in compliance with all Commission technical requirements.²⁰

Accordingly, if a counterproposal fails to comply with the Commission’s city grade coverage rule, the Commission will not accept the counterproposal for consideration.²¹ In light of the foregoing, the Commission should not place the Camp Hill Counterproposal on Public Notice and should dismiss the Camp Hill Counterproposal without further consideration.

B. ISC Fails To Establish That Camp Hill, Alabama, Qualifies As A Community For FCC Allotment Purposes.

12. In addition to its technical deficiency, grant of the Camp Hill Counterproposal would be contrary to the public interest because ISC has failed to establish that Camp Hill, Alabama, qualifies as a community meriting a first local service preference for FCC allotment purposes. In its counterproposal, ISC does not provide any evidence of Camp Hill’s status as a

¹⁹ *Caldwell, College Station and Gause, Texas*, 15 FCC Rcd 3322, ¶ 13 (2000); *affirmed sub nom Roy E. Henderson v. FCC*, 2001 U.S. App. Lexis 13901 (D.C. Cir. May 21, 2001).

²⁰ *Id.* at ¶ 14 (internal citations omitted).

²¹ *See, e.g., Pacific Junction, Iowa*, 15 FCC Rcd 10756, n.1 (2000) (stating that the counterproposal was not placed on Public Notice because the counterproposal failed to comply with the city grade coverage criteria required in Section 73.315(a)); *Susquehanna*, 2000 FCC Lexis 6517 at n.2 (same); *Greenwood*, 3 FCC Rcd 4108 at ¶ 2 (stating that no comparison would be made between a counterproposal that violated the principal city coverage requirement and competing proposals).

community beyond its statement, “As seen in *Attachment 1*, Camp Hill is a census-recognized community of 1,982 persons (2000 Census).”²² The referenced attachment merely provides census data.²³ This minimal information is woefully inadequate to satisfy the Commission’s standards for establishing an area’s community status.

13. The Commission defines communities for allotment purposes as “geographically identifiable population groupings.”²⁴ The Commission has “rejected claims of community status where a nexus has not been shown between the political, social and commercial organizations and the community in question,”²⁵ even where the community is incorporated or listed in the U.S. Census.²⁶ In its Counterproposal, ISC fails to provide *any* evidence of the existence of political, social and commercial organizations in Camp Hill and thus fails to demonstrate a nexus between any organizations and the area known as Camp Hill. The Commission, therefore, should find that ISC has not established that Camp Hill qualifies as a community meriting a first local service preference. The proposed allotment to Camp Hill, therefore, would not result in

²² ISC’s Counterproposal at p. 1.

²³ *Id.* at Attachment 1.

²⁴ *Grants and Peralta, New Mexico*, 14 FCC Rcd 21446, ¶ 8 (1999) (“*Grants and Peralta*”).

²⁵ *Leeds, Utah*, 15 FCC Rcd 11648, ¶ 3 (2000); *see, e.g., Pleasant Dale, Nebraska*, 14 FCC Rcd 18893, ¶ 6 (1999) (“*Pleasant Dale*”); *Kanarraville, Utah*, 14 FCC Rcd 15962 (1999); *Broadview, Montana*, 14 FCC Rcd 14101 (1999).

²⁶ *See Grants and Peralta*, 14 FCC Rcd 21446 at ¶ 8 (finding that Peralta does not qualify as a community despite its listing in the U.S. Census); *Pleasant Dale*, 14 FCC Rcd 18893 at ¶ 6 (finding that petitioner has failed to establish that Pleasant Dale qualifies as a community despite Pleasant Dale’s incorporated status); *Kanarraville, Utah*, 14 FCC Rcd 15962 (1999) (finding that petitioner has failed to establish that Kanarraville qualifies as a community although Commission research found that Kanarraville is incorporated).

first local service and would be contrary to the public interest.²⁷

14. Moreover, the minimal information provided by ISC appears to be inapplicable to Camp Hill, Alabama. ISC submitted an attachment that provides census data and reports a population of 1,982 persons for the 2000 Census for Camp Hill “CCD.”²⁸ “CCD” is the census designation for a “Census county division,” which is defined as “a subdivision of a county that is a relatively permanent statistical area established cooperatively by the Census Bureau and state and local government authorities.”²⁹ The census data for Camp Hill Town, Alabama, reports a population of 1,415 persons for the 1990 Census³⁰ and 1,273 persons for the 2000 Census.³¹ The decline in population since 1990 reflects the decline of the area known as Camp Hill, which has no nexus with any political, social or commercial organizations located in the area.

15. In contrast to the deficiencies of the Camp Hill Counterproposal, Cox’s Counterproposal complies with the Commission’s technical requirements. Moreover, Cox has provided ample evidence in its Comments and Counterproposal to establish that Gardendale,

²⁷ See *Pleasant Dale*, 14 FCC Rcd 18893 at ¶ 6 (finding that the proposed allotment would not serve the public interest because petitioner failed to demonstrate that Pleasant Dale qualifies as a community); *Broadview, Montana*, 14 FCC Rcd 14101, ¶ 3 (1999) (finding that the proposed allotment would not serve the public interest because petitioner failed to demonstrate that Broadview qualifies as a community).

²⁸ ISC’s Counterproposal at Attachment 1.

²⁹ See Exhibit B (Census Glossary (visited July 2, 2001) <http://factfinder.census.gov/home/en/epss/glossary_c.html>).

³⁰ See Exhibit B (U.S. Census Bureau, American FactFinder (visited July 3, 2001) <http://factfinder.census.gov/servlet/QTTable?ds_name=D&geo_id=16000US010295&qr_name=DEC_1990_STF1_DP1&_lang=en>).

³¹ See Exhibit B (U.S. Census Bureau, American FactFinder (visited July 3, 2001) <http://factfinder.census.gov/servlet/QTTable?ds_name=D&geo_id=16000US0111680&qr_name=DEC_2000_SF1_U_DP1&_lang=en>).

Goodwater and Jemison are communities meriting first local service preferences.³² Accordingly, the Commission should deny the Camp Hill Counterproposal and grant Cox's Counterproposal.

III. GRANT OF COX'S COUNTERPROPOSAL WOULD ACHIEVE A PREFERENTIAL ARRANGEMENT OF ALLOTMENTS.

16. Grant of Cox's Counterproposal would achieve a preferential arrangement of allotments based on the FCC's allotment priorities.³³ As discussed in Cox's Comments and Counterproposal, first local service would be provided to the communities of Gardendale, Jemison and Goodwater, while Homewood would maintain its local service, thus invoking the third FM allotment priority.³⁴ Moreover, Cox's Counterproposal would replace a Class A station with a superior Class C station in Homewood and would provide a "net" gain in service to 221,595 persons over an area of 6,030 square kilometers.³⁵ Thus, grant of Cox's Counterproposal would result in a more efficient use of broadcast spectrum and greatly expand the radio services available to the public.

17. Cox's Counterproposal would result in public interest benefits that are clearly superior to any benefits resulting from the competing proposals in this proceeding. Among the proposals and applications that are the subject of the comments filed in this proceeding, only the Auburn Proposal and the Camp Hill Counterproposal are mutually exclusive with Cox's Counterproposal. As discussed above, the Commission should dismiss the Auburn Proposal for lack of an expression of interest and dismiss the Camp Hill Counterproposal as technically

³² See Cox's Comments and Counterproposal at pp. 6-18, 29-32, 34-37.

³³ See *Revision of FM Assignment Policies and Procedures*, 90 FCC 2d 88, ¶ 7 (1982); e.g., *Moncks Corner, Kiawah Island, and Sampit, South Carolina*, 15 FCC Rcd 8973, ¶ 16 (2000).

³⁴ Cox's Comments and Counterproposal at pp. 3, 38.

³⁵ *Id.*

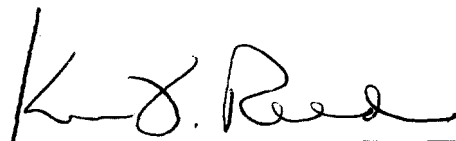
deficient and contrary to the public interest. Accordingly, examination of Cox's Counterproposal demonstrates that the Commission's FM allotment priorities and the resulting public interest benefits clearly weigh in favor of grant of Cox's Counterproposal.

CONCLUSION

18. In light of the foregoing, the Commission should dismiss the Auburn Proposal, dismiss the Camp Hill Counterproposal, and grant Cox's Counterproposal.

Respectfully submitted,

COX RADIO, INC.
CXR HOLDINGS, INC.

By: 

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July 3, 2001

Exhibit A

**Technical Exhibit
by du Treil, Lundin & Rackley, Inc.**

TECHNICAL EXHIBIT
IN SUPPORT OF COMMENTS IN MM DOCKET NUMBER 01-104

Technical Narrative

The Technical Exhibit, of which this Narrative is part, addresses the proposed allotment of Channel 262A to Camp Hill, Alabama. This allotment was submitted as a counterproposal in MM Docket Number 01-104 as a mutually exclusive alternative to the proposed Channel 263A at Auburn, Alabama. However, as discussed below, the proposed Channel 262A allotment does not entirely encompass the community of Camp Hill with its predicted City Grade contour as required by Section 73.315(a) of the Commission's Rules.

Figure 1 is a map showing the predicted 70 dBu coverage contour from the proposed Camp Hill reference site.¹ As can be seen, the 70 dBu contour does not entirely encompass the community of Camp Hill.² Only 17.9 square kilometers, or 76%, and 1,125 persons, or 88%, of Camp Hill is encompassed by the 70 dBu contour.³

¹ At the allotment stage, the coverage is determined by utilizing the maximum power for the class and the antenna height above average terrain ("HAAT"), the latter being determined by averaging the elevations along each of eight radials from 3 to 16 kilometers from a theoretical reference site.

² The community limits for Camp Hill were obtained from the 1996 Census TIGER data.

³ The population data is from the 2000 Census.


There are no known towers at the proposed Camp Hill allotment reference site according to the Commission's tower registration database.

A handwritten signature in black ink, appearing to read 'Charles A. Cooper', with a long horizontal flourish extending to the right.

Charles A. Cooper

du Treil, Lundin & Rackley, Inc.
201 Fletcher Avenue
Sarasota, Florida 34237
941.329.6000

June 28, 2001



JUNE 2001

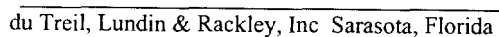


Exhibit B

Camp Hill, Alabama

[FactFinder Help](#) [Census Data Information](#) [Glossary](#) [Tutorials](#)

<#> [A](#) [B](#) [C](#) [D](#) [E](#) [F](#) [G](#) [H](#) [I](#) [J](#) [K](#) [L](#) [M](#) [N](#) [O](#) [P](#) [Q](#) [R](#) [S](#) [T](#) [U](#) [V](#) [W](#) [X](#) [Y](#) [Z](#)

Censo 2000 Puerto Rico en Espanol

Census 2000 Puerto Rico in Spanish. The data for Census 2000 Puerto Rico in Spanish are accessed in FactFinder from a button in the lower left corner of the Main Page. The same data in English are included in the Census 2000 of the United States dataset. FactFinder does not present data from the 1990 Census of Population and Housing for Puerto Rico.

Census

A complete enumeration, usually of a population, but also of businesses and commercial establishments, farms, governments, and so forth.

Census (decennial)

The census of population and housing, taken by the Census Bureau in years ending in 0 (zero). Article I of the Constitution requires that a census be taken every ten years for the purpose of reapportioning the U.S. House of Representatives.

Related terms: [Apportionment](#), [Reapportionment](#), [Redistricting](#)

Census (economic)

Collective name for the censuses of construction, manufactures, minerals, minority- and women-owned businesses, retail trade, service industries, transportation, and wholesale trade, conducted by the Census Bureau every five years, in years ending in 2 and 7.

Census 2000 Dress Rehearsal

The Census Bureau used a dress rehearsal to provide for operational testing of procedures and systems in regional census centers, local census offices, and data capture centers planned for use in Census 2000, including the production of prototype data products that comply with the requirements of Public Law 94-171. The exercise was an opportunity for others to comment on the range of standard products and their formats. The dress rehearsal also included some procedures and systems that had not been tested operationally in any prior field or processing activity. It was conducted in three sites: Sacramento, California; 11 counties in South Carolina and the city of Columbia; and Menominee County, Wisconsin, including the Menominee American Indian Reservation.

Census area

The statistical equivalent of a county in Alaska. Census areas are delineated cooperatively by the state of Alaska and the Census Bureau for statistical purposes in the portion of Alaska not within an organized borough.

Census block

A subdivision of a census tract (or, prior to 2000, a block numbering area), a block is the smallest geographic unit for which the Census Bureau tabulates 100-percent data. Many blocks correspond to individual city blocks bounded by streets, but blocks -- especially in rural areas -- may include many square miles and may have some boundaries that are not streets. The Census Bureau established blocks covering the entire nation for the first time in 1990. Previous censuses back to 1940 had blocks established only for part of the nation. Over 8 million blocks are identified for Census 2000.

Related term: [Block](#)

Census county division (CCD)

A subdivision of a county that is a relatively permanent statistical area established cooperatively by the Census Bureau and state and local government authorities. Used for presenting decennial census statistics in those states that do not have well-defined and stable minor civil divisions that serve as local governments.

Census data information

Information about the data in the Census Bureau tables in FactFinder is found in the "Help" system. This information is referred to as metadata. Information presented under this heading includes description and data content of surveys and censuses, geographical areas covered, level of geographical detail, dataset descriptions, definitions, and lists of tables and products.

Related term: [Metadata](#)

Census Day

DP-1. General Population and Housing Characteristics: 1990

Data Set: 1990 Summary Tape File 1 (STF 1) - 100-Percent data

Geographic Area: **Camp Hill town, Alabama**

NOTE: For information on confidentiality, nonsampling error, and definitions, see <http://factfinder.census.gov/home/en/datanotes/expsf190.htm>.

Subject	Number
Total population	1,415
SEX	
Male	638
Female	777
AGE	
Under 5 years	97
5 to 17 years	301
18 to 20 years	66
21 to 24 years	70
25 to 44 years	409
45 to 54 years	126
55 to 59 years	72
60 to 64 years	63
65 to 74 years	97
75 to 84 years	82
85 years and over	32
Under 18 years	398
65 years and over	211
HOUSEHOLDS BY TYPE	
Total households	542
Family households (families)	373
Married-couple families	204
Other family, male householder	19
Other family, female householder	150
Nonfamily households	169
Householder living alone	152
Householder 65 years and over	78
Persons living in households	1,415
Persons per household	2.61
GROUP QUARTERS	
Persons living in group quarters	0
Institutionalized persons	0
Other persons in group quarters	0
RACE AND HISPANIC ORIGIN	
White	305
Black	1,098
American Indian, Eskimo, or Aleut	6
Asian or Pacific Islander	2
Other race	4
Hispanic origin (of any race)	11
Total housing units	599
OCCUPANCY AND TENURE	
Occupied housing units	542

Subject	Number
Owner occupied	336
Renter occupied	206
Vacant housing units	57
For seasonal, recreational, or occasional use	1
Homeowner vacancy rate	3.2
Rental vacancy rate	7.2
Persons per owner-occupied unit	2.60
Persons per renter-occupied unit	2.62
Units with over 1 person per room	22
UNITS IN STRUCTURE	
1-unit detached	451
1-unit attached	10
2 to 4 units	69
5 to 9 units	1
10 or more units	3
Mobile home, trailer, or other	65
VALUE	
Specified owner-occupied housing units	271
Less than \$50,000	229
\$50,000 to \$99,999	41
\$100,000 to \$149,999	1
\$150,000 to \$199,999	0
\$200,000 to \$299,999	0
\$300,000 or more	0
Median (dollars)	28,400
CONTRACT RENT	
Specified renter-occupied housing units paying cash rent	168
Less than \$250	162
\$250 to \$499	6
\$500 to \$749	0
\$750 to \$999	0
\$1,000 or more	0
Median (dollars)	99
RACE AND HISPANIC ORIGIN OF HOUSEHOLDER	
Occupied housing units	542
White	145
Black	394
American Indian, Eskimo, or Aleut	1
Asian or Pacific Islander	0
Other race	2
Hispanic origin (of any race)	3

(X) Not applicable

Source: U.S. Bureau of the Census, 1990 Census of Population and Housing, Summary Tape File 1 (100% Data)

Matrices P1, P3, P5, P6, P8, P11, P15, P16, P23, H1, H2, H3, H5, H8, H10, H18A, H21, H23, H23B, H32, H32B, H41.

DP-1. Profile of General Demographic Characteristics: 2000

Data Set: Census 2000 Summary File 1 (SF 1) 100-Percent Data

Geographic Area: **Camp Hill town, Alabama**

NOTE: For information on confidentiality protection, nonsampling error, and definitions, see
<http://factfinder.census.gov/home/en/datanotes/expsf1u.htm>.

Subject	Number	Percent
Total population	1,273	100.0
SEX AND AGE		
Male	575	45.2
Female	698	54.8
Under 5 years	99	7.8
5 to 9 years	123	9.7
10 to 14 years	91	7.1
15 to 19 years	94	7.4
20 to 24 years	80	6.3
25 to 34 years	139	10.9
35 to 44 years	205	16.1
45 to 54 years	181	14.2
55 to 59 years	50	3.9
60 to 64 years	51	4.0
65 to 74 years	92	7.2
75 to 84 years	46	3.6
85 years and over	22	1.7
Median age (years)	35.6	(X)
18 years and over	899	70.6
Male	392	30.8
Female	507	39.8
21 years and over	850	66.8
62 years and over	192	15.1
65 years and over	160	12.6
Male	55	4.3
Female	105	8.2
RACE		
One race	1,268	99.6
White	183	14.4
Black or African American	1,081	84.9
American Indian and Alaska Native	0	0.0
Asian	0	0.0
Asian Indian	0	0.0
Chinese	0	0.0
Filipino	0	0.0
Japanese	0	0.0
Korean	0	0.0
Vietnamese	0	0.0
Other Asian ¹	0	0.0
Native Hawaiian and Other Pacific Islander	0	0.0
Native Hawaiian	0	0.0
Guamanian or Chamorro	0	0.0
Samoan	0	0.0
Other Pacific Islander ²	0	0.0
Some other race	4	0.3
Two or more races	5	0.4
Race alone or in combination with one or more other races ³		
White	188	14.8
Black or African American	1,084	85.2

Subject	Number	Percent
American Indian and Alaska Native	2	0.2
Asian	0	0.0
Native Hawaiian and Other Pacific Islander	0	0.0
Some other race	4	0.3
HISPANIC OR LATINO AND RACE		
Total population	1,273	100.0
Hispanic or Latino (of any race)	13	1.0
Mexican	11	0.9
Puerto Rican	1	0.1
Cuban	0	0.0
Other Hispanic or Latino	1	0.1
Not Hispanic or Latino	1,260	99.0
White alone	180	14.1
RELATIONSHIP		
Total population	1,273	100.0
In households	1,273	100.0
Householder	519	40.8
Spouse	153	12.0
Child	403	31.7
Own child under 18 years	274	21.5
Other relatives	149	11.7
Under 18 years	91	7.1
Nonrelatives	49	3.8
Unmarried partner	24	1.9
In group quarters	0	0.0
Institutionalized population	0	0.0
Noninstitutionalized population	0	0.0
HOUSEHOLDS BY TYPE		
Total households	519	100.0
Family households (families)	338	65.1
With own children under 18 years	157	30.3
Married-couple family	153	29.5
With own children under 18 years	59	11.4
Female householder, no husband present	156	30.1
With own children under 18 years	88	17.0
Nonfamily households	181	34.9
Householder living alone	173	33.3
Householder 65 years and over	66	12.7
Households with individuals under 18 years	200	38.5
Households with individuals 65 years and over	138	26.6
Average household size	2.45	(X)
Average family size	3.09	(X)
HOUSING OCCUPANCY		
Total housing units	614	100.0
Occupied housing units	519	84.5
Vacant housing units	95	15.5
For seasonal, recreational, or occasional use	2	0.3
Homeowner vacancy rate (percent)	3.7	(X)
Rental vacancy rate (percent)	20.0	(X)
HOUSING TENURE		
Occupied housing units	519	100.0
Owner-occupied housing units	335	64.5
Renter-occupied housing units	184	35.5

Subject	Number	Percent
Average household size of owner-occupied unit	2.53	(X)
Average household size of renter-occupied unit	2.31	(X)

(X) Not applicable

¹ Other Asian alone, or two or more Asian categories.

² Other Pacific Islander alone, or two or more Native Hawaiian and Other Pacific Islander categories.

³ In combination with one or more other races listed. The six numbers may add to more than the total population and the six percentages may add to more than 100 percent because individuals may report more than one race.

Source: U.S. Census Bureau, Census 2000 Summary File 1, Matrices P1, P3, P4, P8, P9, P12, P13, P17, P18, P19, P20, P23, P27, P28, P33, PCT5, PCT8, PCT11, PCT15, H1, H3, H4, H5, H11, and H12.

CERTIFICATE OF SERVICE

I, Vanese E. Hawkins, hereby certify that a true and correct copy of the foregoing "Reply Comments of Cox Radio, Inc. and CXR Holdings, Inc." was sent on this 3rd day of July, 2001, via first-class United States mail, postage pre-paid, to the following:

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